



EPSTEIN DRANGEL LLP

60 East 42nd Street, Suite 1250, New York, NY 10165
T: 212.292.5390 • E: mail@ipcounselors.com
www.ipcounselors.com

June 3, 2025

MEMO ENDORSED

VIA ECF

Hon. Jessica G. L. Clarke
United States District Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, New York 10007

Re: *King Spider LLC, et al. v. Panda (Hong Kong) Technology Co., Ltd. d/b/a PandaBuy, et al.*
Case No. 24-cv-2668 (JGLC)
Request to Indefinitely Adjourn the Deadline to Submit Joint Letter and Proposed Case Management Plan and the Initial Pretrial Conference

Dear Judge Clarke,

We represent the Plaintiffs in the above-referenced matter (the “Action”).¹ On April 21, 2025, counsel for Defendant Panda (Hong Kong) Technology Co., Ltd. (“Pandabuy”) filed a motion to withdraw as the attorneys of record and stay the Action for sixty (60) days in order to allow Pandabuy to retain new counsel. (Dkts. 153-155). On April 22, 2025, Plaintiffs filed a letter requesting a thirty (30) day stay of the Action, rather than sixty (60) days. (Dkt. 156). On April 24, 2025, the Court granted Plaintiffs’ request and ordered Pandabuy to retain new counsel by no later than May 23, 2025 (“April 24, 2025 Order”). (Dkt. 158). As of the date of this letter, Pandabuy has not done so, accordingly, Plaintiffs respectfully request that the Court indefinitely adjourn the deadline for the parties’ joint letter and Proposed Case Management Plan along with the Initial Pretrial Conference. In accordance with Your Honor’s Individual Rules of Practice, Plaintiffs submit the following:

1. **Original date and new date requested:** Currently, the deadline to file the parties’ joint letter and Proposed Case Management Plan was May 29, 2025 and the Initial Pretrial Conference is currently scheduled for June 5, 2025 at 2:30 p.m. As discussed herein, Plaintiffs are respectfully requesting that these deadlines be indefinitely adjourned.
2. **The number of previous requests for adjournment:** None, this is Plaintiffs’ first request to indefinitely adjourn the deadline to file the joint letter and Proposed Case Management Plan and the Initial Pretrial Conference.
3. **Whether these previous requests were granted or denied:** N/A

¹ Where a defined term is referenced herein but not defined, it should be understood as it is defined in the Glossary in Plaintiffs’ Second Amended Complaint.

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4. **The reason for the adjournment:** Plaintiffs respectfully request an indefinite adjournment of the deadline to file the joint letter and Proposed Case Management Plan and the Initial Pretrial Conference because Pandabuy, in accordance with the April 24, 2025 Order, should have retained new counsel by no later than May 23, 2025. (Dkt. 158). To date, Pandabuy has not done so. Accordingly, there is presently no party in this Action for Plaintiffs to enter a Case Management Plan with.
5. **Whether the adversary consents:** Given that Pandabuy is in default, Plaintiffs did not seek Pandabuy's consent.
6. **The date of the parties' next scheduled appearance before the Court:** The pretrial conference scheduled for June 5, 2025 is the only upcoming scheduled appearance in the Action.

We thank the Court for its time and attention to this matter.

Respectfully submitted,

EPSTEIN DRANGEL LLP

BY: /s/ Jason M. Drangel
Jason M. Drangel (JD 7204)
jdrangel@ipcounselors.com
60 East 42nd Street, Suite 1250
New York, NY 10165
Telephone: (212) 292-5390
Facsimile: (212) 292-5391
Attorneys for Plaintiffs

Application GRANTED. For the reasons identified in King Spider's letter, the parties' deadline to submit a joint letter and case management plan, and the initial pre-trial conference currently scheduled for June 5, 2025 are HEREBY ADJOURNED *sine die*. The Clerk of Court is respectfully directed to terminate ECF No. 160.

SO ORDERED.



JESSICA G. L. CLARKE
United States District Judge

Dated: June 3, 2025
New York, New York